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March 23, 2020

Hon. William F. Kuntz, II
United States District Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: USA v. Khusanov,
17-CR-00475 (WFK)

Dear Judge Kuntz:

We write because the EDNY CJA budgeting office has suggested that we ask the Court to designate *U.S. v. Khusanov* a “Mega-Case” for budgeting purposes and that we additionally submit a proposed pretrial budget to their office. We also request that we be permitted to submit quarterly CJA bills, rather than await the conclusion of the case, given our continuing, significant investment of time and resources as we prepare for trial in October. The Judicial Conference defines a “Mega-Case” as any representation in which “it is anticipated the defense of an individual CJA Defendant will cost in excess of \$30,000 or involve more than 300 hours of attorney time.” *See, e.g.,* <http://www.txed.uscourts.gov/?q=mega-case-non-capital-case-budgeting>

As the Court knows this case began with Mr. Khusanov’s arrest in the Northern District of Illinois in August 2017. Mr. Khusanov was thereafter transferred to the EDNY and this case has now been pending for some two-and-one-half years. This case has already, or will soon, consume more than 300 hours of counsels’ time, which thus far has been uncompensated. Trial is scheduled for October, 2020. Meanwhile, co-counsel Deborah Colson and I have been working diligently, meeting frequently with Mr. Khusanov, reviewing the vast volume of discovery in this case, preparing several motions for the Court’s review, presenting a bail application and prosecuting a related appeal therefrom and working cooperatively with our interpreter, investigator and Middle East expert. As we approach trial we will continue our preparation at an accelerating pace.

Given the complexity of the case, the need for continued interpretation, investigation and consultation with our expert, as well as the need to communicate frequently and at length with Mr. Khusanov, we respectfully ask the Court to designate this

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Hon. William F. Kuntz, II
March 23, 2020
Page-2-

a “Mega-Case” for CJA budgeting purposes and also to permit counsel to submit quarterly CJA bills.

Respectfully,

A handwritten signature in black ink, appearing to read "Rich Levitt", with a stylized flourish at the end.

Richard Levitt

cc: U.S.A.O. EDNY (by ECF)